

**REMARKS**

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

**Disposition of Claims**

Claims 1-5 and 7-10 are pending. Claim 1 is independent. The remaining claims depend, directly or indirectly, from claim 1.

**Rejection(s) under 35 U.S.C. § 102**

Claims 1-5 stand rejected under 35 U.S.C. § 102(b) as being anticipated by US Patent No. 6,507,872 ("Geshwind"). To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

For anticipation under § 102, "[a] claim is anticipated only if *each and every element* as set forth in the claims is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987) (emphasis added). Further, "[t]he identical invention must be shown in as complete detail as is contained in the claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989). Applicants assert that Geshwind fails to disclose each and every element of amended independent claim 1.

The claimed invention is directed to extracting and transmitting an application that is made up of several interactive pages, each interactive page having a main file and included components. The files that make up the application are organized in a tree structure, with depth levels and links between main files. Included components necessary for forming an interactive page (*e.g.*, applets, images, etc.) are pointed to by inclusion links. Navigation links, which are separate and distinct

from inclusion links, are used to reference the main files of other interactive pages that are of different depths. *See* Specification, pages 6, 8, and 16-17.

Accordingly, the claimed invention requires, in part (i) inclusion links that point to included components necessary to form a first interactive page and facilitate display and execution of the included components; (ii) navigation links of a first main file of a first interactive page that reference at least a second main file of a second interactive page that is of higher or lower depth than the first interactive page; and (iii) wherein the inclusion and navigation links are identified using semantic and syntactic analysis.

Geshwind, in col. 23, line 33 – col. 24, line 10, discloses nodes of a tree with a home page at depth level 0 and other pages at depth levels up to level 4, which form an interactive page. Although we do not believe that Geshwind explicitly discloses analysis of the semantic and syntactic content of the main file to identify inclusion links and navigation links, Geshwind does include navigation links in Fig. 13.

Geshwind fails to disclose or render obvious inclusion links. In fact, the components necessary to form the interactive catalog pages disclosed in Geshwind are not referenced by any type of link that is included within a main file. At best, Geshwind only discloses navigation links (*i.e.*, the linkages or relationships in co. 13, ll. 5-49 cited by the Examiner on page 4 of the Action) which link pages that are related to other pages. Accordingly, Geshwind fails to disclose or render obvious (i) as required above.

Further, although Geshwind discloses linkages that could be equated to the navigation links as claimed, Applicants assert that Geshwind fails to disclose or render obvious the structure of the

claimed invention in which each application has a plurality of interactive pages, which each have a main file and included components. In the claimed invention, as amended, a navigation link of a first main file of a first interactive page points to a second main file of a second interactive page. However, the linkages disclosed in Geshwind do not point to main files of other interactive pages. That is, Geshwind discloses that the linkages/relationships are among documents viewed by a user in *a current session*. See Geshwind, col. 13, ll. 24-30. However, there is no disclosure in Geshwind regarding a link from one main file of a first interactive page to another main file of another interactive page. Thus, Applicant asserts that the links/relationships disclosed in Geshwind point to different entities than what is required by the amended claims. Accordingly, Geshwind fails to disclose or render obvious (iii) as recited above.

Geshwind also fails to disclose or render obvious performing any type of semantic or syntactic analysis of a main file of an interactive page to identify/obtain the navigation and inclusion links. In fact, Geshwind makes no mention of performing any type of a semantic and syntax analysis of the content of the main files of an application to identify the inclusion links and the navigation links. That is, because Geshwind does not disclose the structure of an application as is required by the claimed invention, *i.e.*, where an application includes a main file and including components, along with corresponding inclusion links and navigation links, Geshwind cannot possibly disclose parsing the content of main files to perform an analysis to identify inclusion and navigation links.

The Examiner attempts to equate the “assessment” stated in col. 13, line 17 of Geshwind with the semantic and syntactic analysis claimed. See Action, page 4. Applicant respectfully

asserts that the Examiner is either completely reading out claimed limitations or mischaracterizing the prior art, both of which are wholly improper. Further, the Examiner's assertion that the assessment disclosed in Geshwind is equivalent to the analysis claimed is in violation of the guidelines set forth in *In re Wilson*, 424 F.2d 1382, 1385 (CCPA 1970) ("[a]ll words in a claim must be considered in judging the patentability of that claim against the prior art"). The assessment in Geshwind is merely an examination of the interaction of several factors that go toward determining a probability estimate for each file. There is absolutely no mention of semantic or syntactic analysis in Geshwind. In fact, the factors listed in col. 13 of Geshwind include statistical assessments and relationships/linkages of documents. There is no analysis performed in Geshwind of semantics or syntactic of a main file of an interactive page which results in the identifying of *both* navigation links *and inclusion links*. Accordingly, Geshwind clearly fails to disclose or render obvious (iii) as required above.

In view of the above, it is clear that the Examiner's contentions fail to support an anticipation rejection of amended independent claim 1. Further, pending dependent claims are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

#### **Rejection(s) under 35 U.S.C. § 103**

Claims 7 and 9 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Geshwind in view of US Patent No. 6,886,178 ("Mao"). Claim 8 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Geshwind and Mao, and further in view of US Publication No. 2002/0107892 ("Chittu"). Claim 10 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Geshwind,

Mao, and Chittu, and further in view of US Patent No. 6,230,168 ("Unger"). To the extent that these rejections may still apply to the amended claims, the rejections are respectfully traversed.

As described above, Geshwind fails to disclose or render obvious the limitations of the amended claims. Further, Mao, Chittu, and Unger fail to supply that which Geshwind lacks. Specifically, Mao, Chittu, and Unger are all completely silent with respect to two distinct links, *i.e.*, inclusion links and navigation links as defined by amended claim 1. Further, none of Mao, Chittu, and Unger discloses or renders obvious using semantic and syntactic analysis to identify the inclusion links and navigation links as required by amended claim 1.

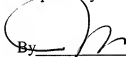
In view of the above, it is clear that amended independent claim 1 is patentable over Geshwind, Mao, Chittu, and Unger, whether taken together or separately. Dependent claims 7-10 are patentable for at least the same reasons. Accordingly, withdrawal of these rejections is respectfully requested.

**Conclusion**

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number [11345/117001]).

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Respectfully submitted,

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